

HOME-ARP Allocation Plan

Submitted 3/24/2023

The County of Delaware was allocated \$3,732,740 in HOME-ARP funds through the American Rescue Plan Act of 2021 (P.L. 117-2) ("ARP") for the HOME Investment Partnerships Program (HOME) to provide homelessness assistance and supportive services.

HOME-ARP funds may be utilized to perform four activities that must primarily benefit qualifying individuals and families who are homeless, at risk of homelessness, or other vulnerable populations. These activities include:

1. Development and support of affordable housing
2. Tenant-based rental assistance (TBRA)
3. Provision of supportive services
4. Acquisition and development of non-congregate shelter units.

Qualifying populations are defined as:

1. Homeless
2. At risk of homelessness
3. Fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or human trafficking.
4. Other vulnerable populations.

To receive funds, the County is required to prepare this HOME-ARP Allocation Plan to identify unmet needs and gaps in housing and/or service delivery systems while identifying eligible activities currently taking place or being planned. The County's HOME-ARP funds will be administered through the Office of Housing and Community Development (OHCD).

In accordance with the requirements of the HOME-ARP statute at Section 3205 of the American Rescue Plan Act of 2021 as described in Notice CPD-21-10: *Requirements of the Use of Funds in the HOME-American Rescue Plan Program*, this Allocation Plan is informed by input from service providers, community-based organizations, advocates and other stakeholders including:

- Delaware County's Continuum of Care (COC)
- Homeless service providers
- Domestic Abuse Project of Delaware County
- Veteran groups
- Public housing agencies (PHAs)
- Public agencies that address the needs of the qualifying populations
- Organizations that address fair housing, civil rights, and the needs of persons with disabilities.

Describe the consultation process including methods used and dates of consultation:

Delaware County recognizes the importance of an effective stakeholder consultation and public participation process to gain information critical to identifying service gaps and priority needs for the qualifying populations in order to use funds to make a meaningful difference with the resources available.

To inform development of the HOME-ARP Allocation Plan, OHCD consulted with a wide range of public and private agencies. Specific outreach and feedback are detailed in the table below and include these efforts:

1. Outreach to the County's Continuum of Care Governing Board on March 1, 2022 to 23 attendees representing 18 organizations and County departments and a preliminary presentation of findings on May 9, 2022.
2. Outreach to the Homeless Services Coalition (HSC) on March 16, 2022, attended by 77 individuals representing 18 social service organizations and 5 County departments. The HSC includes housing providers, mental health organizations, substance abuse treatment providers, domestic violence service providers, homeless service outreach organizations, faith-based organizations, veterans' groups, public housing authorities, the primary youth services organization, the community action agency, the child welfare agency, and the area agency on aging.
3. Outreach at the Housing Task Force on May 13, 2022 attended by 42 individuals representing 32 organizations.
4. Consultations with Delaware County's two (2) public housing authorities. OHCD met with the Chester Housing Authority on May 3, 2022 and Delaware County Housing Authority on January 17, 2023.
5. Outreach to domestic violence service providers included consultation with the Delaware County Victim Assistance Center on February 3, 2023. Consultation with the Domestic Abuse Project of Delaware County (DAP) on March 10, 2023 with additional input through nine (9) survey responses from DAP staff.

To facilitate communication during the consultation process, improve response and identify areas that need improvement, OHCD developed a HOME-ARP survey that was made available to County departments, local nonprofits, housing agencies, housing authorities. The survey instrument, available as an online form, was distributed by email on April 7, 2022 to qualifying population service providers, community-based and advocate organizations through the Homeless Services Coalition contact listserv of more than 175 individuals. Respondents were asked to share the survey with additional relevant contacts. The survey ranked priorities for eligible activities and qualifying populations as well as provided open-ended questions to identify needs/gaps for the Continuum of Care, service delivery, shelter systems and housing inventory. The survey instrument is attached As Appendix A at the end of this document.

List the organizations consulted:

Agency/Org Consulted	Type of Agency/Service Provision	Method of Consultation
Aegis residential services	Non-Profit Behavioral Health Disability	Survey
Breaking Bread Community Shelter	Non-Profit Homeless	Homeless Services Coalition 3/16/22
Catholic Social Services	Non-Profit Senior At-risk of housing instability	Survey COC 3/1/22 Homeless Services Coalition 3/16/22
Chester City	Municipality	Fair Housing Task Force 5/13/22
Chester Community Charter School	School District	Homeless Services Coalition 3/16/22
Chester Economic Development Authority	Government	Fair Housing Task Force 5/13/22
Chester Housing Authority	Public Housing	Survey COC 3/1/22 Homeless Services Coalition 3/16/22 CoC Governing Board 5/9/22 Fair Housing Task Force 5/13/22
Chichester School District	School District	Survey
Child Guidance Resource Center	Non-Profit	CoC Governing Board 5/9/22
Community Action Agency of Delaware County, Inc.	Non-Profit Homeless At-risk of housing instability Disability Veteran	Survey COC 3/1/22 Homeless Services Coalition 3/16/22 CoC Governing Board 5/9/22 Fair Housing Task Force 5/13/22
County of Delaware – Adult & Family Services	Government Homeless At-risk of housing instability	Survey Fair Housing Task Force 5/13/22 CoC Governing Board 5/9/22
County of Delaware – Children & Youth Services	Government Youth Homeless At-risk of housing instability	Survey COC 3/1/22 Homeless Services Coalition 3/16/22 Fair Housing Task Force 5/13/22 CoC Governing Board 5/9/22
County of Delaware – Services for the Aging (COSA)	Government Senior	Survey
County of Delaware – Department of Human Services	Government Homeless At-risk of housing instability Disability Veteran	Survey COC 3/1/22 Homeless Services Coalition 3/16/22 CoC Governing Board 5/9/22 Fair Housing Task Force 5/13/22
County of Delaware – Victim Assistance Center	Domestic/dating violence Sexual assault Stalking Human trafficking	Consultation 2/3/2023 Survey
Delaware County Housing Authority	Public Housing	Consultation 1/17/2023 COC 3/1/22 Homeless Services Coalition 3/16/22

		CoC Governing Board 5/9/22 Fair Housing Taskforce 5/13/22
Domestic Abuse Project of Delaware County	Non-Profit Domestic/dating violence Sexual assault Stalking Human trafficking	Consultation 3/10/23 Survey CoC Governing Board 5/9/22
Haverford Township	Municipality	Fair Housing Taskforce 5/13/22
EDSI Delaware County	Workforce Development	Homeless Services Coalition 3/16/22
Elwyn	Non-Profit Disability; At-risk of housing instability	Survey
Fair Acres Geriatric Center	Government Senior	Survey
Family & Community Service of Delaware County	Non-Profit Homeless At-risk of housing instability Behavioral Health	COC 3/1/22 Homeless Services Coalition 3/16/22 CoC Governing Board 5/9/22
Horizon House, Inc	Non-Profit Homeless At-risk of housing instability	Survey COC 3/1/22 Homeless Services Coalition 3/16/22 CoC Governing Board 5/9/22
Housing Equality Center of PA	Non-Profit Civil rights Fair housing	Survey Homeless Services Coalition 3/16/22 Fair Housing Task Force 5/13/22
Legal Aid of Southeastern PA	Non-Profit Civil rights Fair housing	Survey Homeless Services Coalition 3/16/22
Maternity Care Coalition- Healthy Families America	Non-Profit Health	Survey Homeless Services Coalition 3/16/22
Mental Health Partnerships	Non-Profit Homeless At risk of housing instability	Survey COC 3/1/22 Homeless Services Coalition 3/16/22
Merakey	Behavioral Health At-risk of housing instability	Survey Homeless Services Coalition 3/16/22
Natale Media Program	Non-Profit Crisis residential Disability At-risk of housing instability	Survey
Reliable Best Care	Senior	Survey
Society of St. Vincent DePaul	Non-Profit At-risk of housing instability	Survey
Southeast Delco School District	School District	Survey
Taylor Made Vets	Veteran	Survey
The Foundation for Delaware County	Non-Profit At-risk of housing instability Health	Survey COC 3/1/22 Homeless Services Coalition 3/16/22 CoC Governing Board 5/9/22 Fair Housing Task Force 5/13/22
The Salvation Army	Non-Profit	Survey

	Homeless At-risk of housing instability Disability Veteran	CoC 3/1/22 Homeless Services Coalition 3/16/22 CoC Governing Board 5/9/22 Fair Housing Task Force 5/13/22
United Way	Non-Profit Homeless At-risk of housing instability	CoC Governing Board 5/9/22
Valley Youth House	Non-Profit Civil rights Fair housing At-risk of housing instability	Survey
Values Into Action	Non-Profit Disability	Fair Housing Task Force 5/13/22

Summarize feedback received and results of upfront consultation with these entities:

Consultation

OHCD conducted a robust consultation process to inform the development of the HOME-ARP Allocation Plan. For this effort, OHCD solicited input and recommendations from county agencies, stakeholders and organizations that serve and represent the Qualifying Populations, including those with lived experience. The consultation process included participation from 14 government agencies and 25 organizations.

Specific input received from consultations included:

- There is a shortage of shelter beds for all populations.
- The need for more affordable housing in safe, desirable neighborhoods.
- The need for shelter space that can accommodate family households, domestic violence victims, LGBTQ+ individuals, households with pets, individuals with mental and/or behavioral issues, and disabled seniors.
- Requests for non-congregate shelter space.
- Concern about the number of evictions following the end of pandemic-related Emergency Rental Assistance Program (ERAP).
- A Temporary Emergency Shelter to assist with the County’s Cold Weather Plan shelter was set up at the County-funded Breaking Bread facility which is currently in development.
- Chester Housing Authority requested support with development of new rental properties and upgrade of owned and managed existing properties.
- Delaware County Housing Authority requested support with upgrading existing owned and managed rental properties. DCHA also is looking to provide accommodations for individuals with physical disabilities.

Survey Results

The HOME-ARP Survey was completed by 61 individuals at 22 service provider organizations, six (6) county agencies, one (1) public housing authority, and two (2) school districts.

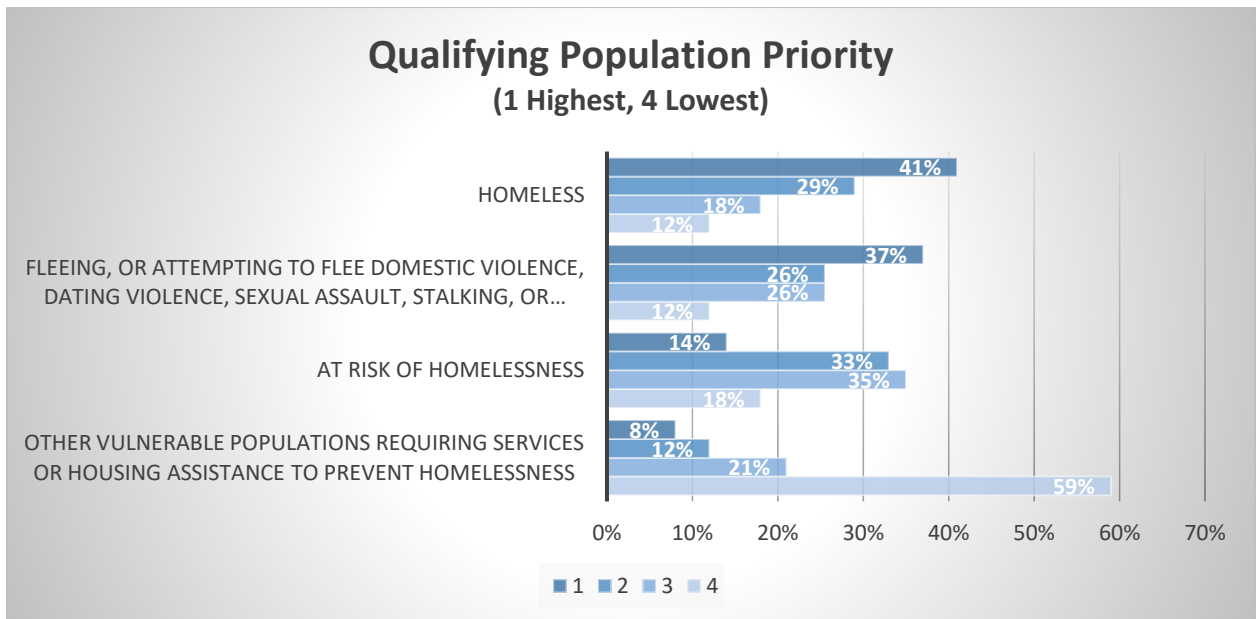
Of the survey respondents, 76% are residents of Delaware County and 98% work in or provide services in the county. Fifteen (29%) have lived experience of homelessness.

The majority of respondent’s report that individuals have difficulty accessing emergency shelter. More than half (53%) state it is very difficult or difficult to get into a shelter and 25% state it is somewhat difficult while only 8% state it is easy or somewhat easy. Sixteen percent (16%) of respondents do not know how difficult it is to enter shelter services.

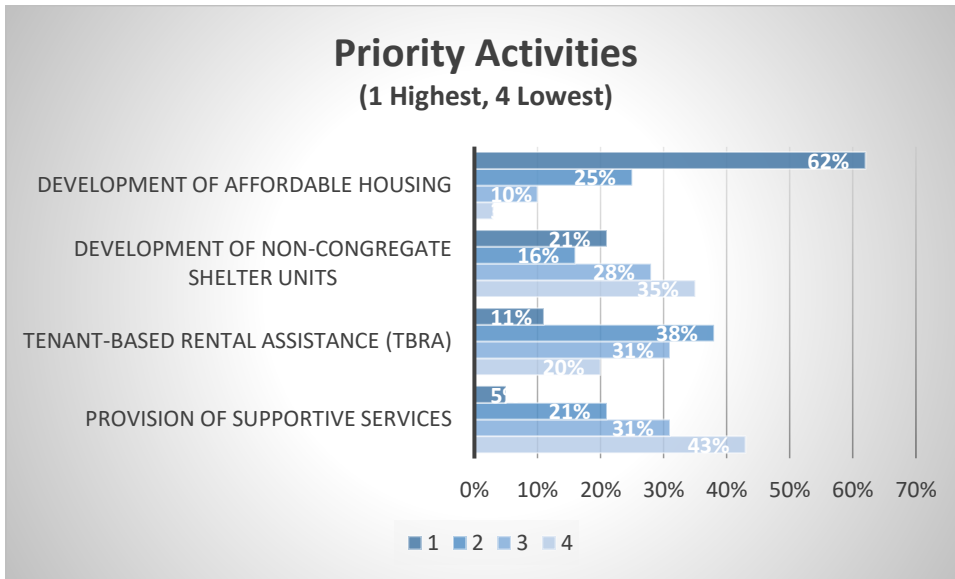
Survey respondents ranked the priority of the four qualifying populations. In order of highest priority, responses were Homeless (41%), Violence/Assault/Trafficking (37%), At-Risk of Homelessness (14%) and Other Vulnerable Populations (8%). Refer to *Graph 1: Qualifying Population Priority* for complete responses.

Survey respondents also ranked the priority of potential HOME-ARP-funded activities. The majority of respondents selected the Development of Affordable Housing (62%) as the greatest priority followed by Non-Congregate Shelter (21%), Tenant-Based Rental Assistance (11%), and the Provision of Supportive Services (5%). Refer to *Graph 2: Priority Activities* for complete responses.

Graph 1: Qualify Population Priority



Graph 2: Priority Activities



The survey included open ended questions regarding what needs or gaps exist for the qualifying populations regarding the 1) Continuum of Care, 2) Service Delivery System, 3) Shelter System, and 4) Housing Inventory. Detailed survey responses are included in Appendix B. Most frequent responses included:

1) Continuum of Care

- More shelter beds needed.
- Improve and diversify access to the Coordinated Entry system, including having more than one (1) service provider for Coordinated Entry.
- Add an online application and modernize access to the Coordinated Entry system.
- Increase shelter and case management staffing, training and funding.
- Eviction prevention services and funding are needed to reduce homelessness.

2) Service Delivery

- Improve awareness of and access to programs and resources.
- Improve efficiency of accessing the service delivery system.
- Provide better salaries to retain quality and trained staff.
- Provide additional staff development and training to facilitate outreach and service delivery.
- Increase services for intellectually disabled, mental/behavioral health, and substance abuse populations.
- Increase self-sufficiency education and services.

3) Shelter System

- Provide non-congregate shelter.
- Add additional providers/shelters and find creative solutions.

- Add shelters that can accommodate families without separating husbands/fathers from their families.
- Add a shelter for LGBTQ+ population.
- Add shelter beds for victims of domestic violence and abuse.
- Decrease the amount of time it takes to re-home individuals in shelters.

4) Housing Inventory

- Lack of affordable housing, particularly in safe and desirable neighborhoods.
- Cost of living and rent burden are significant issues that make it hard to find/keep housing.
- Eviction prevention assistance services are needed.
- Credit score and large down-payment requirements can prevent qualified populations from accessing affordable housing.
- Lack of landlords willing to accept Vouchers or participate in programs.
- Concern regarding monopolies on the ownership of properties.
- Concern regarding the poor physical condition of properties.

Conclusions

The County is committed to allocating HOME-ARP funding in response to the priorities identified during the allocation planning process. The consultation process included meetings with stakeholders, opportunities for local task forces to provide input and/or ask questions, and the use of a survey instrument.

Consultations indicated the need for shelter space that can accommodate specialized populations such as families, domestic violence victims, and LGBTQ+ individuals. Additionally, public housing agencies requested assistance with the provision of additional units of affordable housing and upgrades to existing units.

Through the consultation process, OHCD explored possible solutions for the provision of emergency non-congregate shelter units such as the adaptive re-use of motels and modular options including refurbished shipping containers and tiny homes.

Survey responses quantified the greatest qualifying population priority as Homeless and the greatest priority activity as the Development of Affordable Housing. Consultations identified the priority needs for each Qualifying Population including the addition of affordable housing and the creation of non-congregate shelter beds.

Public Participation

Describe the public participation process, including information about and the dates of the public comment period and public hearing held during the development of the plan:

- Date of Public Notice: 3/8/2023 (Copied in Appendices below)
- Public Comment Period: 3/8/2023 - 3/24/2023
- Date of Public Hearings: 3/14/2023 and 3/20/2023

In accordance with HOME-ARP guidance and the County's Citizen Participation Plan, the County encouraged citizen participation in the development of the HOME-ARP Allocation Plan through the opportunity for the public to comment on the proposed plan. The proposed plan included the amount of HOME-ARP funding available to the County and the range of proposed activities and priorities.

OHCD adhered to applicable fair housing and civil rights requirements and procedures for effective communication, accessibility and reasonable accommodation for persons with disabilities and meaningful access to participation by limited English proficient (LEP) residents.

The proposed draft plan was available for review on OHCD's website and was available in print copy upon request. Translation services were available upon request.

Residents and the public were provided with reasonable notice of 15-days to review and comment with feedback or plan amendments. A public hearing was held on March 20, 2023 and public comments were accepted at the County Council agenda meeting on March 14, 2023. During all consultation sessions and the public hearing, the County provided information on the qualifying populations to be served by HOME-ARP as well as all eligible activities that could be funded.

Describe efforts to broaden public participation:

Notice of the draft plan and public hearing was posted on the County's website beginning 3/8/2023 and in the Philadelphia Inquirer – Delaware County Edition newspaper on 3/8/2023. Additional notification was provided to service providers and stakeholders at the 3/15/2023 Homeless Services Coalition meeting.

Summarize the comments and recommendations received through the public participation process either in writing, or orally at a public hearing:

The following comments and recommendations were received through the public participation process:

- Multiple attendees stated there is need for increased case management and wrap-around services to support sheltered persons and find permanent housing.
- Some municipalities are more supportive than others regarding the physical location of an emergency shelter. To access employment opportunities, medical and other resources, it can be helpful for an emergency shelter to be located near a transportation hub.
- Some individuals and families in need of shelter are not willing to go a shelter in the City of Chester.
- A question was asked regarding how the County will market the Request for Proposals for the use of HOME-ARP funds. The County representative stated that the RFP will be advertised according to local and federal rules.
- A question was asked as to how the County can incentivize municipalities to support the location of an emergency shelter. The County representative stated that the RFP selection process may include priority points for a location in a high opportunity zone.
- There was a general discussion regarding possible solutions regarding the provision of non-congregate shelter. The County clarified HUD's definition of non-congregate. Attendees suggested Tiny Homes or the renovation of a motel or nursing home as a shelter.
- An attendee commented that with current high interest rates, banks/lenders such as the Federal Home Loan Bank have additional revenue that could possibly be directed towards the provision of affordable housing.

Summarize any comments or recommendations not accepted and state the reasons why:

All comments and recommendations were accepted.

Needs Assessment and Gaps Analysis

In accordance with HOME-ARP guidance, OHCD evaluated the size and demographic composition of each qualifying population and assessed the unmet needs of each population. In addition, OHCD identified gaps within the County’s current shelter system and housing inventory and service delivery system.

Data sources used included the most recent available Point-In-Time count (PIT), Housing Inventory count (HIC), and other data available through the CoC. Data and information provided through consultations with service providers was used to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services.

Table 1: Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population (Individuals/Households)				Gap Analysis			
	Family		Adults Only		Vets	Family - at least 1 child	Adult (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	167	51	161	#	#								
Transitional Housing	46	24	33	#	#								
Permanent Supportive Housing	150	55	265	#	93								
Other Permanent Housing	#	#	#	#	#								
Sheltered Homeless						182/48	107/103	6	21				
Unsheltered Homeless						0/0	46/46	2	0				
										15	-	13	-

2022 Point in Time Count (PIT), 2021 PIT (Veteran data); 2020 Continuum of Care Housing Inventory Count (HIC), Consultation

Table 2: Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	64,965		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	15,500		
Rental Units Affordable to HH at 50% AMI (Other Populations)	10,805		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		32,710	17,210
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		14,475	3,670
			20,880

American Community Survey (ACS), Comprehensive Housing Affordability Strategy (CHAS) 2014-1018

Describe the size and demographic composition of qualifying populations within the PJ’s boundaries:

HOME-ARP funds are required to be used to primarily benefit individuals and families in specified HOME-ARP “qualifying populations.” As defined in 24 CFR 91.5, qualifying populations include, but are not limited to, the following:

1. Homeless
2. At risk of homelessness
3. Fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or human trafficking.
4. Other vulnerable populations.

Sources for Qualifying Population size and demographic data include the PY 21 CAPER, the 2018-2022 Consolidated Plan, and the 2021 and 2022 Point-In-Time Counts.

1. Homeless

In accordance with HUD’s definition of homeless under the HOME-ARP grant, homeless is defined as:

- An individual or family who lacks a permanent and adequate permanent home
- A person or family who will imminently lose their permanent home due to a lack of resources or support
- A youth under the age of 25, even if accompanied by an adult, that does not have a permanent home.

In FY 21, 437 homeless individuals were served at emergency shelters in Delaware County. Of these, 91 homeless individuals were served at the Life Center shelter; 68 homeless households comprised of 217 persons were served at the Wesley House shelter; and 71 homeless households comprised of

129 homeless women and children who were victims of domestic violence were served at the Domestic Abuse Project shelter.

The PIT Count indicates that, on the night of February 22, 2022, there were a total of 151 households in emergency shelters or transitional housing and 46 households were unsheltered. Eight (8) individuals are chronically homeless, 5 of whom were unsheltered. The majority of the priority unsheltered individuals (78%) were male.

There were no unsheltered families as it is a County goal is to ensure that no homeless families are without shelter. In addition to diversion strategies, the County operates a limited Temporary Emergency Shelter Program that utilizes hotel/motel vouchers for families and vulnerable adults when no shelter beds are available. The majority of families with children in need of assistance are female headed households with limited incomes. Of the 335 persons who were homeless that day, 34% were children under the age of 18.

Nearly 58% of the homeless identified were over the age of 24, including 100% of the unsheltered individuals and 34% were under age 18. All of those under age 18 were residing in sheltered situations. The remaining 8% of the persons counted were between the ages of 18 and 24. While more than half (53%) of the total homeless population identifies as female, the unsheltered population identifies as majority male (78%).

Overall, 60% of the identified homeless were Black and 30% White. Of the unsheltered population, 70% were Black. The majority (94%) of the homeless population considered themselves non-Hispanic. Compared to the County's overall population of which approximately 22% is Black (according to the 2021 ACS), people of color are disproportionately represented in the homeless system.

2. At Risk of Homelessness

HUD defines those at risk of homelessness as individuals and families who have an income below 30% of the area median income (AMI), do not have sufficient resources or support networks to prevent them from becoming homeless, or live with instability, such as moving two or more times during the last 60 days due to economic reasons.

According to HUD's 2014-2018 CHAS data, 12% (24,790) of Delaware County's 206,405 households have incomes at or below 30% AMI. Of these, 63% are renter households and 80% (19,675) have one or more housing problems. Housing problems may include housing cost burden, overcrowding, lack of kitchen facilities, and/or lack of plumbing facilities. These households are considered at risk of becoming homeless.

Data from the Delaware County Housing Authority's 2022 Annual Plan indicates that 72% of the households on their waiting lists are very low-income (\leq 30% AMI) and 20% are low-income (between 30-50% AMI.) Of the total households on the waitlists, 74% are families with children, 17% are disabled, 86% are Black and 7% are Hispanic. While the total number of households on DCHA's waitlist is difficult to determine because DCHA maintains separate lists for each of its properties, it is stated in the County's Consolidated Plan that there are more than 30,000 households on the waitlist.

DCHA reports that there are more than 11,000 households waiting for tenant-based rental assistance housing vouchers. Of these, 76% are very low-income and 20% are low-income.

3. Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

For HOME-ARP, this population includes any individual or family who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking. It includes cases where an individual or family reasonably believes that there is a threat of imminent harm from further violence due to dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return or remain within the same dwelling unit. Domestic violence can be physical abuse, as well as emotional, psychological, financial, sexual, or a combination of many forms.

Delaware County has one primary provider for the shelter and support of individuals who are fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or human trafficking. The Domestic Abuse Project safe house emergency shelter provides for up to 11 families at a time and consistently has a 100% utilization rate, with length of stay up to 30 days. In the current housing market, it is becoming increasingly difficult to place clients in permanent housing within the 30-day limit. Survivors and children that need emergency shelter when the Safe House is 100% occupied are provided hotel vouchers for safe accommodations.

In FY 21, DAP's hotline received 3,317 calls. The agency provided shelter services to 71 households comprised of 129 homeless women and children who were victims of domestic violence, dating violence, sexual assault, stalking or human trafficking. All 71 households were female headed. The majority (96%) of the household individuals identify as non-Hispanic and 80 (62%) were American Indian/Alaskan Native or Native Hawaiian/Other Pacific Islander. Of the individuals served, 116 (90%) are extremely low-income with incomes below 30% AMI.

The Delaware County Victim Assistance Center provides comprehensive services to victims of crime including sexual assault. In 2021, the hotline received 2,503 calls and provided direct services related to sexual assault to 1,557 individuals.

Due to under reporting, it is difficult to know the overall number of individuals experiencing domestic/dating violence, sexual assault, stalking or human trafficking. As reported in OHCD's most recent Consolidated Plan, it is estimated that approximately only 10% of the population seek services from DAP or other service providers in the County.

Underserved communities within this population in Pennsylvania as identified by the Pennsylvania Coalition Against Domestic Violence include people with a disability, people of color, refugee and immigrant residents, those identifying as LGBTQ+, and male survivors.

4. Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice

HOME-ARP qualifying populations also include other populations who have previously qualified as homeless, are currently housed with temporary or emergency assistance, and those who need additional housing assistance or supportive services to avoid a return to homelessness. In addition, HUD defines those at greatest risk of housing instability as households that have an annual income less than 30% AMI and are experiencing severe cost burden or have an income less than 50% AMI and meet a certain condition, such as living in someone else's home or living in a hotel due to an economic hardship.

Cost burden and severe cost burden are the most significant factors linked to instability and an increased risk of homelessness. Cost Burden is defined as spending more than 30% of household income spent on housing costs and Severe Cost Burden is defined as spending more than 50% of household income on housing costs. CHAS (2018) data shows that of all households in the County, 31% are faced with housing cost burden and 14% are severely cost burdened. While this includes both homeowners and renters, renters within the County make up the largest population experiencing housing cost burden. Almost half (46%) of the County's total renter population experiences housing cost burden, and 23% experience severe cost burden. The relative numbers increase as income declines. For renters At-Risk of homelessness (incomes less than 30% AMI), 77% are cost burdened and 68% are severely cost-burdened. Similarly, cost burden for At-Risk homeowners is similar with 81% of the lowest-income homeowners experiencing cost burden and 66% severely cost burdened. Of the total homeowners in the County, 24% experience cost burden and 10% severe cost burden. Residents with the lowest incomes predominately experience cost burden and severe cost burden issues.

According to HUD's 2014-2018 CHAS data, 12% (24,790) of Delaware County's 206,405 households have incomes at or below 30% AMI. Of these, 63% are renter households and 80% have one or more housing problems such as cost burden, overcrowding, lack of kitchen facilities, and/or lack of plumbing facilities. Severe cost burden (more than 50% of a household's monthly income spent on monthly housing costs) is experienced by 14% of the County's households.

According to the National Low-Income Housing Coalition Out of Reach Study (2022), Delaware County has 65,658 renter households and a monthly affordable rent at 30% of the AMI is \$791. ACS 2021 data indicates 65,658 occupied rental units with 55% of these households paying more than 30% of their monthly income to rent.

The Delaware County Emergency Rental Assistance Program (ERAP) processed 12,889 grants for rent and/or utility assistance. On average, households received \$5,755 to cover costs for 9.75 months. These households had experienced a loss of income or were struggling to pay rent and/or utilities because of impact by the COVID-19 pandemic. The average household income of participants was \$23,155. The majority (86%) of grant funds distributed benefitted households earning 50% AMI or less; more than half (54%) benefitted households earning 30% AMI or less.

Delaware County's most recent Consolidated Plan (2018-2022) defines additional property characteristics associated with instability and increased risk of homelessness to include the age and condition of the physical property. The majority (74%) of Delaware County's housing stock was built

before 1970 and issues such as lack of maintenance, older windows, leaking roofs and aging heating systems add to the cost burden of the County's low- and very low-income populations and increases the likelihood that residents of these properties will become At-Risk of homelessness.

Identify and consider the **current resources** available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing:

The County recently created a Housing Workforce Committee to collaborate with community partners and stakeholders in the provision of affordable housing, particularly in relation to meeting the needs of the homeless and at-risk of homelessness. The Workforce met for the first time in February 2023 and is tasked with the goal of identifying actionable items to address housing needs for the County's homeless, at-risk of homelessness and other vulnerable populations.

Another group, the Homeless Services Coalition, includes County departments and social service organizations and meets quarterly to share resources and improve communication in meeting the needs of the County's homeless and At-Risk populations.

Funding

The Delaware County Continuum of Care (CoC), serving urban Delaware County and the HUD entitlement areas of Upper Darby, Chester City and Haverford was awarded \$5.38 million in 2021 to provide Emergency Shelter, Rapid Rehousing, Transitional Housing, Permanent Supportive Housing and related supportive services.

Delaware County receives an annual allocation of federal dollars to increase access to safe, decent and affordable housing, supportive services, public facilities, emergency shelter facilities and other services for the county's moderate- and low-income households. In PY 21, \$7,844,653 in federal funding was expended through the Community Development Block Grant (CDBG), Home Investment Partnerships (HOME), and Emergency Solutions Grant (ESG) programs. Federal expenditures included \$5,411,720 in annual entitlement funding, \$2,136,047 in CARES funding, \$292,451 Lead Hazard Control Grant funding and \$4,435 in State ESG funds. CARES funding was expended through the CDBG-CV and ESG-CV programs in response to Covid-19-related impact.

In addition, the following local public funding was expended in PY 21 to support of the County's activities to assist moderate- and low-income population.

- County of Delaware Act 137 Funds (AHF) \$ 1,698,441
- Local Demolition Funds \$ 716,562
- Local Government \$1,891,845

Pandemic response measures included assistance to renters, homeowners, and social service agencies:

- The Emergency Rental Assistance Program (ERAP) provided \$82.9 million rent and/or utility assistance for 12,889 grants and related program administration costs. The program provided

- rent and utility assistance to households who are at risk of losing their housing or experiencing utility shutoffs due to the financial impact of the COVID-19 pandemic.
- The Delco CARES Homeowner Assistance Program assisted homeowners impacted by pandemic-related economic hardship. Using CDBG-CV funds from the federal Coronavirus Aid, Relief, and Economic Security (CARES) Act, Delco CARES provides eligible Delaware County homeowners with up to three (3) months of mortgage and/or utility payment assistance up to \$6,000 total. To date, 128 households have been assisted for a total of more than \$600,000 of mortgage and utility payments.
- Over \$350,000 in Delco Impact Grants were awarded to social service agencies experiencing increased demand for services in response to the pandemic.

Shelter Resources

Within the emergency and transitional housing facilities, the 2021 Housing Inventory included 308 Emergency Shelter beds, 201 Rapid Rehousing beds, 79 Transitional Housing beds and 403 Permanent Supportive Housing beds.

There are five (5) emergency shelters serving the county. The Eastern Life Center of Delaware County and Salvation Army provides emergency shelter to single adults. The Family Management Center serves families with children, and the Wesley House Community Corporation serves families with children and single women. The Domestic Abuse Project of Delaware County serves victims of domestic violence and their dependent children.

The Breaking Bread shelter is currently operating as a Temporary Emergency Shelter providing overnight shelter for seventeen single adults. Construction finding to operate as an emergency shelter is being secured and is anticipated in Spring 2024, providing 30 beds serving single adults with wrap around services including case management. The rooms will be congregate and can accommodate pets.

Shelter resources became significantly strained since 2020 with the closing of Connect-by-Night and Family Promise of Delaware County.

Voucher Assistance

The County provides rapid rehousing using the Housing First approach and tenant-based vouchers including Emergency Housing Vouchers, Elderly/Disabled vouchers, Family unification and Veterans vouchers in addition to Mainstream Vouchers.

As of February 2023, Delaware County Housing Authority (DCHA) has the following vouchers under lease:

- 2,392 Mainstream
- 43 Emergency Housing
- 61 Elderly/Disabled
- 104 Family Unification
- 57 Veteran's Assistance

Affordable Housing Inventory

There are 4,134 units of affordable rental housing on Delaware County's current Affordable Housing Inventory, of which 2,271 are private/non-profit owned and operated and 1,863 are public housing units. Of the total units, 1,312 are age-restricted and 467 are accessible. County investment in affordable senior housing recently increased with the addition of 231 units of senior housing at Simpson Gardens II, Makemie Court, St. Josephs Place and Kinder Park IV.

DCHA serves 705 households in public housing with an additional 231 households receiving project based rental assistance, and 2,879 households receiving Section 8 tenant based rental assistance. They also have over 30,000 households on their waiting list demonstrating a great need for more affordable housing. Of the residents currently waiting for DCHA assistance, the majority (73%) are very-low income and 20% are low-income at 30% or less of Area Media Income (AMI). This is especially true for the families with children which make up the highest number of households served by the DCHA and on their waiting lists.

Homeownership Assistance

The County helps low-income homeowners stay in their homes by funding critical repairs programs. In partnership with Habitat for Humanity, the County works to preserve existing homeownership housing stock by helping 15-20 households per year to make major systems repairs.

The County was allocated more than \$4.5 million in PA state ARPA funding to operate a Whole Home Repair Program. The County is currently soliciting proposals to operate the program and secure wrap around services providing financial literacy. The County expects to begin accepting applications for the program in summer 2023. Assistance of up to \$50,000 will be provided for approximately 80 income-eligible households, preserving homeownership and contributing to the stabilization of the County's aging housing stock.

The supply of affordable homeownership opportunities in desirable locations is being increased through a land conservatorship program partially utilizing HOME CHDO funds. This program is in a pilot phase, with four (4) single-family properties going through the process. Properties assisted with HOME funds will be restricted to buyers at or below 80% median family income.

Describe the unmet housing and service needs of qualifying populations:

Of the County's 206,405 households as reported in the 2018 CHAS, 12% (24,790) are very-low income, and of these 63% are renters. Approximately one third (32%) of total households and almost half (46%) of renters experience at least one (1) housing problem and 16% experience severe housing problems. Almost one third (31%) of all Delaware County households are cost burdened, meaning that monthly housing costs including utilities exceeds 30% of the household's monthly income and 14% (29,500) of households are severely cost burdened, paying more than 50% of their monthly income towards housing costs.

Factors such as the COVID-19 pandemic-related housing market bubble and the related rapid increase of rental and homeownership housing costs, inflation, and the State's low minimum wage have

exacerbated the cost burden for the County's low-income households and increased the number of at-risk of homelessness residents.

Survey and consultation responses for Qualifying Populations identified the need for an increased amount of affordable housing as a means of reducing the likelihood of households becoming homeless or at-risk of homelessness.

The need for affordable housing is quantified by the waitlists for public housing and vouchers. DCHA has over 30,000 households on their waiting list demonstrating a great need for more affordable housing. Of the residents currently waiting for DCHA assistance, the majority (73%) are very-low income and 20% are low-income at 30% or less of Area Media Income (AMI). This is especially true for the families with children which make up the highest numbers of households served by the DCHA and on their waiting lists.

Many social service organizations serving the Qualifying Populations have seen an increase in demand for services since the onset of the pandemic. The County awarded \$383,389 in Delco Impact Grants to six (6) organizations to address the increase needs of pandemic-related services.

The housing and service needs of each Qualifying Populations are detailed below.

Homeless

- Improve access to the County's Coordinated Entry system. Suggestions include having more than one service provider, more convenient location(s) for intake assessments, and creating an online registration and referral system.
- Increase the number of shelter beds to reduce the likelihood of turning households away. Emergency Shelter, Temporary Shelter and Permanent Supportive Housing operate at capacity and maintain waitlists.
- Provide non-congregate shelter units to accommodate specific populations, allow households/families to be housed together, and minimize exposure to viruses.
- Increase the supply of Permanent Supportive Housing for households with children and single adults.
- Extend the duration of Permanent Supportive Housing rental assistance. Many households need more than the 24 months of rental assistance provided currently.
- Increase resources for intensive case management and other services such as housing navigators, job training and employment services.

At Risk of Homelessness

- Provide additional Housing Choice Vouchers including for Disability and Veteran households.
- Increase eviction mediation and foreclosure prevention services.
- Provide rent/mortgage and utility assistance.
- Increase availability of rapid rehousing units to prevent households from entering the homeless system as well as to rapidly rehouse those experiencing homelessness.
- Increase other types of supportive services to prevent households from becoming homeless.
- Increase the supply of affordable housing units.

- Provide landlord education on vouchers and other forms of assistance to reduce source of income discrimination.
- Expanded supportive services and outreach for individuals experiencing substance abuse, chronic illness, mental/behavioral health
- Critical repairs and rehabilitation assistance for homeowners, such as roof, sewer lateral and furnace repairs/replacements.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking

- Increase the number of shelter beds for domestic abuse victims by adding non-congregate units that can adequately assist the population and, in particular, accommodate families with children and LGBTQ+ persons. The current dormitory style beds with shared baths and shared kitchen is not considered suitable given trauma-informed practice.
- Increase resources to extend the maximum length of stay beyond 30 days if necessary. It is becoming harder and harder to find housing within the current 30-day period.
- Provide resources and find housing for special populations such as undocumented immigrants, LGBTQ+ individuals and clients with mental health issues.
- Increase the supply of affordable housing. The largest unmet need for the DV population is available permanent affordable housing that clients in the emergency shelter and transitional housing facilities can be placed into. Even with supportive services and wrap-around assistance, the obstacles to finding permanent housing are high.
- Identify landlords willing to accept rapidly rehoused individuals.
- Increase the number of skilled case managers. Staff turnover is high and there is a shortage of skilled case managers, especially in programs that offer job training and childcare assistance
- Increase services providing job training and childcare assistance for DV population to access job opportunities and achieve economic independence.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability

- Provide funding for special population vouchers including family unification, non-elderly disabled and veterans.
- Rent/mortgage and utility assistance for an indefinite period of time in order to allow households to remain housed.
- Improve access to opportunity. High housing costs can have a greater impact on families with children who need multiple bedrooms and individuals with disabilities who need accessible housing or housing located close to accessible transportation.
- Increase job and educational training to improve housing stability outcomes.
- Identify landlords willing to accept Housing Choice Vouchers and/or SSI and SSDI payments.
- Provide programs and services to improve financial literacy and credit scores.
- Increase housing counseling services.
- Provide funding to support construction of rental units accessible to persons with physical disabilities.

Identify any gaps within the current shelter and housing inventory as well as the service delivery system:

The primary gaps in the system are:

- 1) Insufficient affordable rental housing.
- 2) Insufficient number of shelter beds.
- 3) Lack of non-congregate shelters.
- 4) Insufficient resources to prevent homelessness.

Table 1: Homeless Needs Inventory and Gap Analysis (p. 11) shows there are 167 Emergency Shelter beds in 51 units for families and 161 beds for single adults in the County. On the night of the 2022 PIT count, there were 182 family members in 48 households and 107 single adults that were sheltered and 46 unsheltered. All the unsheltered were single adults. There was a gap of 15 family beds and 13 adult beds. Survey and consultation input confirms the need for additional shelter units, in particular to accommodate family households and individuals in a non-congregate setting.

Table 2: Housing Need Inventory and Gap Analysis (p. 12) shows there are 64,965 rental units in Delaware County, of which 15,500 units are affordable to households At-Risk of Homelessness (with incomes at/below 30% AMI) and 10,805 units are affordable to households with incomes at 50% AMI and are likely to include Other Qualifying Populations. Of the total renter households with one (1) or more severe housing problem, 32,710 are At-Risk of Homelessness (at/below 30% AMI) and 14,475 are at/below 50% AMI. Overall, there is a gap of 20,880 units of rental unit housing for the County's low-income renters, with a gap of 17,210 units for the At-Risk of homelessness population.

While 30 beds of Emergency Shelter for single adults will be added with the opening of Breaking Bread Shelter, the shelter system lost more than 30 beds due to the closing of Connect-By-Night and Family Promise of Delaware County. Additionally, the Eastern Life Center is still not operating at full-capacity due to social distancing needs and staff shortages. Overall, there are less emergency shelter bed available currently than there were before Connect-By-Night and Family Promise stopped operating in 2020.

The use of motel stays during the pandemic to provide socially distanced emergency shelter accentuated the need for non-congregate shelter options to safely house individuals and families without exposure to COVID-19 or other viruses. Additionally, feedback from providers and system users indicates that non-congregate accommodations are preferred. Previously, limited resources were available for motel stays to address emergency shelter needs, particularly to house family units when shelters were at capacity. The County's shelter facilities currently offer zero (0) non-congregate options.

Survey and consultation responses for all Qualifying Populations state the need for more affordable housing. This is quantified by the waitlists for units and vouchers at DCHA and CHA. DCHA has over 30,000 households on their waiting lists. In particular, there is need for units that accommodate families in safe and desirable neighborhoods.

Under *Section IV.4.2.ii.G* of the HOME-ARP Notice, a PJ may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-ARP allocation plan. These characteristics will further refine the definition of “other populations” that are “At Greatest Risk of Housing Instability,” as established in the HOME-ARP Notice. If including these characteristics, identify them here:

Delaware County’s most recent Consolidated Plan (2018-2022) defines additional property characteristics associated with instability and increased risk of homelessness to include the age and condition of the physical property in the county.

The majority (74%) of Delaware County’s housing stock was built before 1970 and lack of maintenance, older windows, roofs, heating systems, etc. add to the cost burden of the County’s low- and very low-income populations and increases the likelihood that residents of these property will become At-risk of homelessness. These issues are exacerbated by declining household income, the pandemic and inflation related costs of housing repair services and materials. The high cost of housing coupled with the older age of the housing stock can lead to maintenance issues and additional housing burdens like substandard housing. This adversely affects the lowest income populations whose incomes do not allow for maintenance or increased housing costs.

The rental stock in Delaware County is also older, with the median rental unit constructed in 1958. Aging rental structures may be in poor condition and expose households with few options to substandard living conditions. Additionally, many rental units do not have enough bedrooms to accommodate larger households, thus increasing the likelihood of crowding.

Identify **priority** needs for qualifying populations:

Priority needs were identified through the consultation process and those relevant to all Qualifying Populations include:

1. Increase the supply of affordable rental housing.
2. Provide non-congregate shelter beds/units.

Additional priority needs relevant to specific Qualifying Populations include:

Homeless

- Improve access to the County’s Coordinated Entry system.
- Increase the overall number of shelter beds.
- Extend the duration of Permanent Supportive Housing rental assistance.
- Increase resources for intensive case management and other related services.

At Risk of Homelessness

- Increase eviction prevention resources including landlord mediation, long-term rent/utility assistance, employment training and access to childcare.
- Increase supply of Housing Choice Vouchers.
- Identify landlords willing to accept vouchers.
- Increase housing and credit counseling resources and services including budgeting and renter/homeowner training.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking

- Add non-congregate shelter units to more adequately meet the needs of trauma victims.
- Increase beds and resources to meet the needs of families with children, LGBTQ+ persons, undocumented immigrants and persons with mental/behavioral health issues.
- Increase availability of affordable housing for the rapid placement of victims.
- Identify landlords willing to accept individuals receiving rapid rehousing assistance.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability

- Increase eviction prevention resources including landlord mediation, long-term rent/utility assistance, employment training and access to childcare.
- Increase job and educational training and access to childcare to improve housing stability outcomes.
- Increase housing and credit counseling resources and services including budgeting and renter/homeowner training.
- Provide critical repairs and rehabilitation assistance to allow homeowners to remain housed.

Explain how the PJ determined the level of need and gaps in the PJ's shelter and housing inventory and service delivery systems based on the data presented in the plan:

Needs and gaps in the County's shelter and housing inventory and service delivery systems were determined by an analysis of the data presented in this plan and input from the organizations consulted.

Presentations to the CoC, Homeless Services Coalition, and Fair Housing Task Force and feedback from the HOME-ARP survey were utilized to provide organizations with the opportunity to indicate priorities and needs for the qualifying populations. Additionally, OHCD consulted with the County's public housing agencies and domestic abuse service provider.

Priorities were identified based on a consensus approach taking into consideration input from all sources.

HOME-ARP Activities

Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:

The County will utilize a request for proposals (RFP) process to solicit competitive proposals (including turn-key proposals for development) where the County determines that conditions are not appropriate for the use of sealed bids.

The RFP will clearly identify the relative importance of price and other evaluation factors and subfactors including qualifying factors associated with HOME-ARP funding. A mechanism for fairly and thoroughly evaluating the technical and price proposals will be established before the solicitation is issued. Proposals will be handled to prevent disclosure of the number of offerors, identity of the offerors, and the contents of proposals. The proposals will be evaluated only on the criteria stated in the request for proposals.

Unless there is no need for negotiations with any of the offerors, negotiations will be conducted with offerors who submit proposals determined to have a reasonable chance of being selected for award, based on evaluation against the technical and price factors as specified in the RFP. Such offerors will be accorded fair and equal treatment with respect to any opportunity for negotiation and revision of proposals. The purpose of negotiations will be to seek clarification with regard to and advise offerors of the deficiencies in both the technical and price aspects of their proposals to assure full understanding of and conformance to the solicitation requirements. No offeror will be provided information about any other offeror's proposal, and no offeror will be assisted in bringing its proposal up to the level of any other proposal. Offerors will not be directed to reduce their proposed prices to a specific amount in order to be considered for award. A common deadline will be established for receipt of proposal revisions based on negotiations.

After evaluation of proposal revisions, if any, the contract will be awarded to the responsible firm whose qualifications, price and other factors considered, are the most advantageous to the County.

Professional services, including but not limited to architect, engineer and legal services in the excess of the small purchase limitation (\$25,000) may be obtained by either the competitive proposals method or qualifications-based selection procedures, unless State law mandates the specific method. Sealed bidding, however, will not be used to obtain professional services. Under qualifications-based selection procedures, competitors' qualifications are evaluated, and the most qualified competitor is selected, subject to the negotiation of fair and reasonable compensation. Price is not used as a selection factor under this method. Qualifications-based selection procedures will not be used to purchase other types of services even though architect-engineer firms are potential sources.

Describe whether the PJ will administer eligible activities directly:

Delaware County Office of Housing and Community Development will administer the HOME-ARP program directly. Subgrantees selected for development of a non-congregate shelter or affordable rental housing will be required to execute a HOME Partnership Agreement outlining the responsibilities of the County and Subgrantee for administration.

If any portion of the PJ's HOME-ARP administrative funds are provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the PJ's entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ's HOME-ARP program:

The County will not provide any administrative funds to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan.

Table 3: Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$0.0		
Acquisition and Development of Non-Congregate Shelters	\$ 2,422,829		
Tenant Based Rental Assistance (TBRA)	\$0.0		
Development of Affordable Rental Housing	\$ 750,000		
Non-Profit Operating	\$ 0.0	0 %	5%
Non-Profit Capacity Building	\$ 0.0	0 %	5%
Administration and Planning	\$ 559,911	15 %	15%
Total HOME ARP Allocation	\$ 3,732,740		

Describe how the PJ will distribute HOME-ARP funds in accordance with its priority needs identified in its needs assessment and gap analysis:

Priority needs identified in the needs assessment and gap analysis are:

1. Increase the supply of affordable rental housing.
2. Provide non-congregate shelter beds/units.

Delaware County will allocate \$750,000 towards the provision of affordable rental housing and \$2,422,829 for the development of non-congregate shelter units. Efforts will be made to leverage other funds to maximize the benefit of the HOME-ARP grant. The selected projects will not violate fair housing or civil right requirements and will be available to all HOME-ARP identified qualifying populations.

Other priority needs identified will be pursued through alternate federal, state and local resources. Recognizing that housing stability is a critical indicator for health, education and employment outcomes, County Council recently convened a Working Housing Group of stakeholders, elected officials,

government agencies, nonprofit service providers, developers and interested community members to meet quarterly and develop actionable items to address homelessness/shelter resources and renter and homeowner issues for at-risk of homelessness by the end of 2023.

Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:

Delaware County currently has a scattered site shelter system concentrated within two Delaware County Municipalities. The shelters use a dormitory setting except for two shelters that serve families. These dormitory-style shelters led to an increased dependency on hotel stays during the COVID-19 pandemic and shelters were required to depopulate to reduce the transmission risk. In addition, one organization that provided overnight shelter in churches to 30 individuals per night was forced to cease operations during the pandemic. The changes due to these circumstances has led to a realization that a centralized, non-congregate shelter offering wraparound McKinney-Vento eligible supportive services is a need in our community to increase the permanent housing success of those experiencing homelessness and ensure unbiased access.

HOME-ARP Production Housing Goals

Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation:

The goal across all Qualifying Populations is to create 15 new construction affordable rental units. While the provided housing production goal calculation worksheet estimates 19 units with a set-aside of \$750,000, based on recent increased labor and material costs, the County believes that creation of 15 units is an attainable goal.

Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how the production goal will address the PJ's priority needs:

The production of 15 new construction units will address our identified highest priority need of new available affordable rental units for households at and below 50% MFI. The creation of these units will reduce the risk of homelessness for households burdened with unaffordable rents as well as increase the affordable housing options for the clients of the PHAs Housing Choice Voucher programs and the Emergency Housing Voucher programs.

Preferences

Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:

Delaware County will not establish a preference; all Qualifying Populations will be eligible for County HOME-ARP funded projects.

Any preference established in the future will be described in an amendment to this Allocation Plan and will not violate any fair housing, civil rights, or nondiscrimination requirements at the federal, state, or local level, which includes but is not limited to requirements found in 24 CFR 5.105(a).

If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

No preferences are identified.

Referral Methods

Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJ's may use multiple referral methods in its HOME-ARP program:

Delaware County will use the Coordinated Entry system as an indirect referral source. Coordinated Entry will be used for intake in order to add eligible applicants to the relevant HOME-ARP project waiting list. Referrals from the project waitlist will be selected in order of which they were received. Coordinated Entry will not be used to admit applicants directly to a HOME-ARP assisted project.

If the PJ intends to use the coordinated entry (CE) process established by the CoC, describe whether all qualifying populations eligible for a project or activity will be included in the CE process, or the method by which all qualifying populations eligible for the project or activity will be covered:

Coordinated Entry will not be used to admit applicants directly to a HOME-ARP-assisted project as it does not include all of the Qualifying Populations. Referrals will be accepted from other sources including emergency shelters, domestic violence support agencies/organizations, street outreach programs and service providers.

All referrals will be placed on the relevant project wait list and admitted in order of the referrals receipt.

If the PJ intends to use the CE process established by the CoC, describe the method of prioritization to be used by the CE:

Coordinated Entry will not be used to admit applicants directly to a HOME-ARP-assisted project. The CoC Coordinated Entry method of prioritization will not be utilized.

If the PJ intends to use both a CE process established by the CoC and another referral method for a project or activity, describe any method of prioritization between the two referral methods, if any:

Coordinated Entry will not be used to admit applicants directly to HOME-ARP assisted projects as it does not include all of the Qualifying Populations. Referrals will be accepted from other sources and include emergency shelters, domestic violence support agencies/organizations, street outreach programs and service providers. All referrals will be placed on project wait lists and admitted in order of referral receipt. Source of referral will not give one applicant preference or prioritization over another.

Limitations in a HOME-ARP rental housing or NCS project

Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV.A of the Notice:

Delaware County will not establish limitations on eligibility.

If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

Not applicable.

If a limitation was identified, describe how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation through the use of HOME-ARP funds (i.e., through another of the PJ's HOME-ARP projects or activities):

Not applicable.

APPENDICES

Appendix A: HOME-ARP Survey Instrument

Appendix B: HOME-ARP Survey Responses

Appendix C: Public Notice and Public Hearing

Appendix D: Certifications